

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

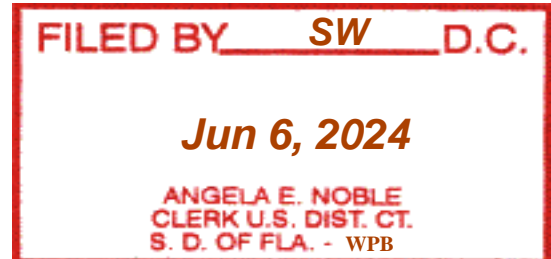
Case No. 24-mj-8274-WM

UNITED STATES OF AMERICA,

v.

THOMAS PETER KATSAMPES,

Defendant.



CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
4. Did this matter involve the participation of or consultation now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

By: Gregory Schiller  
Gregory Schiller  
Assistant United States Attorney  
FL Bar No. 0648477  
500 S. Australian Ave., Suite 400  
West Palm Beach, FL 33401  
Tel: 561-820-8711  
Email: Gregory.schiller@usdoj.gov

## UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

THOMAS PETER KATSAMPES

Case No. 24-MJ-8274-WM

*Defendant(s)*FILED BY SW D.C.

Jun 6, 2024

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - WPB

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Febuary 2022 to November 2022 in the county of Palm Beach in the  
Southern District of Florida, the defendant(s) violated:*Code Section*

18 U.S.C. § 2251(d) and (e)

*Offense Description*

Conspiracy to advertise child pornography

This criminal complaint is based on these facts:

See attached Affidavit

☒ Continued on the attached sheet.David J. Backlund  
*Complainant's signature*

FBI Special Agent David J. Backlund

*Printed name and title*Subscribed and sworn to before me in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone (FaceTime).Date: 06/06/2024William Matthewman  
*Judge's signature*City and state: West Palm Beach, Florida

United States Magistrate William Matthewman

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT**

I, David J. Backlund, a Special Agent with the Federal Bureau of Investigation (“FBI”) being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent of the FBI since September 2008, and am currently assigned to the FBI’s Child Exploitation Operational Unit within the Criminal Investigative Division. As part of my duties as a Special Agent, I am assigned to investigate violations of federal law, including the online exploitation of children. This includes violations pertaining to the illegal trafficking, production, transmission, possession, and receipt of material depicting the sexual exploitation of minors.

2. I am submitting this affidavit in support of a criminal complaint and arrest warrant for THOMAS PETER KATSAMPES, year of birth: 1973, social security number: XXX-XX-1321. I submit there is probable cause to believe that beginning at least in or February 2022, and continuing through in or about November 2022, in the Southern District of Florida and elsewhere, KATSAMPES conspired with others to advertise child pornography in violation of 18 U.S.C. § 2251(d) and (e). The term “child pornography,” as used in this affidavit, refers to the definition set forth in 18 U.S.C. § 2256(8)(A).

3. 18 U.S.C. § 2251(d) and (e) prohibit any person from conspiring to knowingly make, print, or publish, or cause to be made, printed or published, any notice or advertisement seeking or offering to receive, exchange, buy, produce, display, distribute, or reproduce, any visual depiction, if the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct, when such person knows or has reason to know that such notice or advertisement will be transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any

means including by computer, or when such notice or advertisement was transported using any means or facility of interstate or foreign commerce or in or affecting interstate commerce by any means including computer. Here, I submit that there is probable cause that KATSAMPES violated 18 U.S.C. § 2251(d) and (e) because, as described more fully below, he was a staff member and facilitator of a website that was dedicated to the advertisement, distribution, and exchange of child pornography, and on which, in accordance with the rules of the website, users advertised and distributed child pornography via notices and advertisements in the form of URL links and descriptive text.

4. The statements contained in this affidavit are based in part on information provided by FBI Special Agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by FBI agents and computer forensic professionals; and my experience, training and background as a Special Agent with the FBI. Since this affidavit is being submitted for the purpose of securing a Criminal Complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe KATSAMPES has violated 18 U.S.C. § 2251(d) and (e).

5. The FBI is investigating a website (hereinafter referred to as the “TARGET WEBSITE”) that, until November 2022, allowed users to engage in online communications with other users. The TARGET WEBSITE consisted of at least 100 registered members. Until approximately July 2022, a high-ranking administrator of the TARGET WEBSITE resided in Palm

Beach County, Florida, within the Southern District of Florida, and advertised child pornography and took acts to help manage the website from his home.

6. Users of the TARGET WEBSITE trafficked in child pornography images and videos via the posting of web links within messages. These links allowed a user to navigate to another website, such as a file-hosting website, where images and/or videos were stored in order to download these images and videos. When posting the links, users of the TARGET WEBSITE also generally included descriptive text that provided information about the sexual acts and age and gender of the child victim depicted in the linked-to child pornography files. The TARGET WEBSITE provided rules that instructed users to share child pornography in this manner.

7. FBI investigation has further revealed that a particular user of the TARGET WEBSITE, acting under a particular online alias and referred to here as the “SUBJECT USER,” acted in a position of leadership on the website. According to communications made over the TARGET WEBSITE, the SUBJECT USER attained a rank on TARGET WEBSITE that afforded him the responsibility to moderate user activity in a room on the TARGET WEBSITE that was available to the public. The FBI has determined that the SUBJECT USER had been active on the TARGET WEBSITE from at least February 2022 until the website ceased operating in November 2022.

8. On July 1, 2022, the FBI executed a search warrant in the Southern District of Florida that resulted in the FBI gaining access to the TARGET WEBSITE’s server. A review of that evidence revealed the following:

- a. The SUBJECT USER registered on the TARGET WEBSITE on February 27, 2022.
- b. The SUBJECT USER posted an introduction in TARGET WEBSITE’s “role playing” room—*i.e.*, a room on the TARGET WEBSITE where users could chat

with one another to fantasize and role play the sexual abuse of children. In this introduction, the SUBJECT USER stated: *“hi there! :-P i am [SUBJECT USER] :-P .i want to share my cute pics with you. will you play with me? :-P. Things i love: cute, \*cute\*, and more \*CUTE!\* :-P esp. 5-11, cutie spreads, cute asians!, girl on girl, outdoor, underwear, swimsuit, kissing, tongues, school, bath, alluring poses, laughter, fun, happiness, tickling, licking... mmmmm...so fun! Things i don't love: degrading comments, scat, gore, crying, force, abuse, beatings, hurtcore, stresscore, blood, rape, coercion, animals/zoo, extreme, moderate or excessive bdsm, disfigurement, smoking, sadness...this intro isn't specific to RP, although i am learning :-P. if i disconnect or timeout i will usually try to reconnect. if i don't, RL interrupted and i am so sorry. thank you @[TARGET WEBSITE administrator] and [TARGET WEBSITE] staff for my heart. i all my friends here... :-P stay cute!”*

9. From October 2020, until the TARGET WEBSITE ceased operating in November 2022, an FBI Online Covert Employee (hereinafter referred to as the “OCE-1”) maintained a presence on the TARGET WEBSITE. OCE-1 documented evidence related to the SUBJECT USER’s activity on the TARGET WEBSITE, to include:

- a. On or about March 10, 2022, a TARGET WEBSITE staff member posted the following in one of the TARGET WEBSITE staff rooms: *“Welcome back & congratulations again @[SUBJECT USER]! Now that you have earned your COLORS your next step is to try to earn your ♥ heart ♥.”* “Colors” on the TARGET WEBSITE signified that the user had posted enough child pornography to become a member of the website, which resulted in the ability to access one of the TARGET WEBSITE’s “member’s only” rooms. A user who earned “colors” could also then

protect his username with a password so nobody else could use it. After earning “colors,” a user of the TARGET WEBSITE could also choose what color his username appeared in when chatting with other users. After a user earned his “heart,” that user was afforded access to additional “Member’s Only” rooms on the TARGET WEBSITE, including a room dedicated to sharing advice on how to avoid law enforcement detection and rooms dedicated to specific topics and categories of child pornography.

- b. On or about November 1, 2022, the head administrator of the TARGET WEBSITE posted the following message in the TARGET WEBSITE staff room: *“Let’s @All welcome our newest [acronym for TARGET WEBSITE moderator], @[SUBJECT USER] who will be starting in a couple of hours. Please take your time helping them get used to the scripts and commands like everybody else. That’s our final new [acronym for TARGET WEBSITE moderator] for now. This will give us some time to get everybody’s ‘normal’ shift figured out and reassess where we’re at. I’m looking forward to having you as part of the [room on the SUBJECT WEBSITE] team @[SUBJECT USER].”*
- c. On or about November 1, 2022, the SUBJECT USER posted the following message, which was directed to two TARGET WEBSITE users: *“please do not post links from Loli Club 8 chan or any other image sites. Only post using image hosts that are on TL2.2. Thank you. Please note that links to posts on message boards and not direct uploads are not allowed to be posted at [the TARGET WEBSITE] and may be automatically removed!”*

- d. On or about November 2, 2022, the SUBJECT USER posted the following, which was directed to another TARGET WEBSITE user: *“The [TARGET WEBSITE’s publicly available room] Rules: 1. Use a readable understandable nickname and use only English. 2. You may post any on-topic content but must label every post. 3. Be nice! (this also means no revealing of personal information or discussion of alternative ways to chat, no requests without contributing, no posting archives, no spamming, trolling, scamming, begging, & no posting links from message/image boards, or not on Topic Links 2.2 and please don’t discuss other sites and their status.”*
  - e. On or about November 2, 2022, the SUBJECT USER posted the following message in the TARGET WEBSITE’s publicly available room: *“A BIG Thank-you to ALL who are sharing in content and conversation. We could not have a chat without both. Those who participate here will be recognized for their efforts & offered their ‘COLOR’s’, which means you are being watched for an invitation as a full ♥heart ♥member of [the TARGET WEBSITE] with access to all the other rooms here (and potentially access to our famous [TARGET WEBSITE room consisting of thousands of child pornography links]!).”*
10. The SUBJECT user posted child pornography to the TARGET WEBSITE that was collected by OCE-1, which included the following:
- a. On or about June 3, 2022, the SUBJECT USER emailed another TARGET WEBSITE USER with the subject line “us?” using the TARGET WEBSITE’s email function. The email contained a link, which redirected to another webpage containing 25 images of prepubescent girls laying on a bed. One of the girls is



estimated to be between eight and 10 years of age while the other is estimated to be between five and seven. The girls are fully nude or partially nude in every image. Two of the images are close ups of the older girl's exposed vagina. In multiple images, the girls are digitally manipulating each other's vaginas and in two, the younger girl is spreading the older girl's labia in what appears to be an effort to further expose the older girl's vagina for the camera.

- b. On or about September 27, 2022, the SUBJECT USER posted a link in a "Members Only" room tagged "[hebe]," "[girl]," and "[fingering]," and the comment "*girl gets her pretty slit toyed.*" "Hebe" is short for "hebephile" or "hebephilia," which in turn refers to a sexual interest in early pubescent minors or a person who has such a sexual interest. OCE-1 accessed this link, which redirected to another website containing a contact sheet. A "contact" sheet is a collage of screenshots taken from a video, and which serves a preview for what that video depicts. The contact sheet available at the link included eight images depicting a fully nude, prepubescent girl, estimated to be between the ages of eight and 10. An adult man is inserting phallic objects into the girl's anus and/or vagina in seven of the screen captures. In the eighth image, the adult male is digitally manipulating the girl's vagina and the image has words stating "*masked Girl Rides Again Part 2*" superimposed over the image.
- c. On or about October 13, 2022, the SUBJECT USER posted a link in a "Members Only" room tagged "[tween]," "[girl]," and "[bj]," and the comment "*he has a cute lil playmate :-P.*" OCE-1 accessed this link, which redirected to a contact sheet containing 16 images depicting a prepubescent girl estimated to be between the

ages of seven and nine. In multiple images, the girl performs oral sex on an adult man's penis. In one of the images, the girl's legs are spread wide apart and her vagina is prominently exposed for the camera. The girl has no noticeable pubic hair and young bodily and facial features.

**IDENTIFICATION OF THOMAS KATSAMPES AS THE SUBJECT USER**

11. On or about June 6, 2024, the FBI executed a search warrant at KATSAMPES's residence in the District of Minnesota. During the execution of the search warrant, and after being advised of his rights, KATSAMPES made the following admissions:

- a. He was the SUBJECT USER on the TARGET WEBSITE.
- b. He received his "colors" on the TARGET WEBSITE and was eventually promoted to the status of moderator of the website. He further stated that, as a moderator, he made posts to inform users of the TARGET WEBSITE's rules.
- c. He posted child pornography to the TARGET WEBSITE that included children as young as 8 years old engaged in sex acts with adults. He specifically admitted that he made the post with the comment "*girl gets her pretty slit toyed*" described in paragraph 10.b, above.
- d. He is interested in role-playing the sexual abuse of children, particularly role playing the abuse of girls between the age of 8 and 11.
- e. He has been on other websites dedicated to child pornography and/or discussion of the sexual abuse of children.

12. During the execution of the search warrant, FBI agents also discovered evidence of KATSAMPES's involvement with images depicting the sexual abuse of children. For example,

agents discovered thumbnail images depicting child sexual abuse on KATSAMPES's devices, including the following:

- a. An image depicting a young girl who appears to be approximately 7 to 10 years old. In the image, the girl is entirely naked and is spreading her legs to expose her naked genitals to the camera. She is also holding a marker near her genitals.
- b. An image depicting a young girl who appears to be approximately 3 to 5 years old. The girl appears to be naked and her hands are on an adult man's naked, erect penis. The girl's mouth is very close to the man's penis.
- c. An image depicting a young girl who appears to be approximately 4 to 7 years old. In the image, the girl is entirely naked with her legs spread to expose her naked genitals to the camera. She appears to be manually manipulating her genitals.

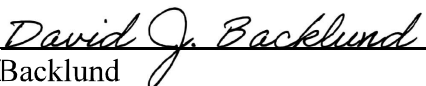
A "thumbnail" image is a small version of an image that is automatically created by the Windows operating system from a larger version of that image that is present on the device. KATSAMPES's devices also contained numerous anime-style images depicting child sexual abuse, including children as young as toddlers.

(Continued on next page.)

**CONCLUSION**

13. For these reasons, your Affiant respectfully submits that there is probable cause to believe that believe that beginning at least in or about February 2022, and continuing through in or about November 2022, THOMAS PETER KATSAMPES violated 18 U.S.C. § 2251(d) and (e) in the Southern District of Florida and elsewhere. I therefore respectfully request that the Court authorize a Criminal Complaint and Arrest Warrant for THOMAS PETER KATSAMPES.

Respectfully submitted,

  
\_\_\_\_\_  
David J. Backlund  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to me by applicant by telephone (Facetime) per the requirements of Fed. R. Crim. P. 4(d) and 4.1 on this 6th day of June, 2024.

  
\_\_\_\_\_  
HON. WILLIAM MATTHEWMAN  
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** THOMAS PETER KATSAMPES

**Case No:** 24-mj-8274-WM

Count #1:

Conspiracy to advertise child pornography

18 U.S.C. § 2251(d) and (e)

**\* Max. Term of Imprisonment:** 30 years

**\* Mandatory Min. Term of Imprisonment (if applicable):** 15 years

**\* Max. Supervised Release:** Life (mandatory minimum term of 5 years)

**\* Max. Fine:** \$250,000 fine and a \$5,000 special assessment

**\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**